

## ***Exhibit B***

CAUSE NO. DC-14-12402

JOHN DOE I, JANE DOE I, JANE DOE II,  
JANE DOE III, JANE DOE IV, AND  
JANE DOE V

VS.

WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.  
(and/or d/b/a or a/k/a WATCHTOWER  
BIBLE AND TRACT SOCIETY OF  
PENNSYLVANIA, INC.), KINGDOM  
HALL JEHOVAH'S WITNESSES  
(CENTRAL ENGLISH) OF DALLAS,  
TEXAS, KINGDOM HALL  
JEHOVAH'S WITNESSES OF  
PLANO, TEXAS, KINGDOM HALL  
JEHOVAH'S WITNESSES OF  
GREENVILLE, TEXAS, AND  
REGINALD TYRONE JACKSON

IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

14<sup>TH</sup> JUDICIAL DISTRICT

**AFFIDAVIT OF GARY N. BREAUX**

STATE OF NEW YORK §  
§  
COUNTY OF PUTNAM §

GARY N. BREAUX, having been duly sworn, on oath deposes and says the following:

1. I am over age twenty-one (21) am of sound mind, and am capable of making this affidavit. I have personal knowledge of the facts stated in this affidavit, all of which are true and correct.

2. I have been one of Jehovah's Witnesses since August 6, 1956. During the 1980's and early 1990's, I served as an elder and a circuit overseer, which is a traveling elder, in various locations in the United States. I have never served as an elder or circuit overseer in Texas.

3. Starting February 25, 1994, I began working at the national headquarters of Jehovah's Witnesses where I continue to work.

4. From February 1994 through March 28, 2007, I worked in the Service Department of the national headquarters, providing spiritual advice, counsel, and support to congregation elders and congregations of Jehovah's Witnesses and assisting other elders in the Service Department.

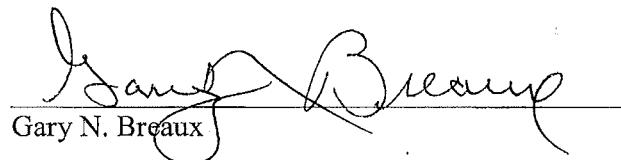
5. On March 28, 2007, my work responsibilities changed when I was appointed as a member of the Branch Committee of Jehovah's Witnesses in the United States of America. I am one of 15 members of the U.S. Branch Committee. Our Committee oversees the preaching activity, construction of facilities, and organization of more than 1.1 million Jehovah's Witnesses in over 13,000 congregations in the United States.

6. On January 2, 2008, my responsibilities again changed when I was appointed as a Director, Assistant Secretary, and Assistant Treasurer to the Watchtower Bible and Tract Society of New York, Inc. I have continuously held those positions since my appointment.

7. My responsibilities on the Branch Committee and as a director and officer of the Watchtower Society place significant burdens on my time. I am required to travel frequently throughout the United States and to other nations. The latter half of April, all of May, and most of June and July are scheduled with meetings, talks, presentations, and teaching at various schools. The time I would have to devote to prepare for and give a deposition would conflict with my schedule and take me away from important duties associated with my work.

8. Other people associated with Watchtower have responsibilities similar to those I had until 2007. Among them are Thomas Jefferson, Jr., Richard Chilton, Alvaro Hernan Steele, and Richard Ashe, Jr. All presently work in the Service Department, know the policies, procedures, and documents of the Service Department that were disseminated to congregation elders by Watchtower, and can respond to inquiries on these topics.

9. At no point prior to the filing of the present lawsuit did I have any information relevant to any of the Plaintiffs or to the incidents of abuse claimed in this lawsuit. I have no knowledge of any specific facts relevant to this case. To the extent the policies and procedures of Jehovah's Witnesses, and Watchtower's documentation thereof, are at issue, I have no special or particular knowledge of such information, and others who are available to provide testimony on Watchtower's behalf could testify about such matters.

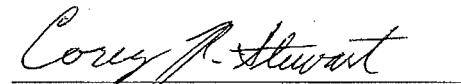


Gary N. Breaux

STATE OF NEW YORK                   §  
   §  
COUNTY OF PUTNAM                   §

Before me, a notary public, on this day personally appeared Gary N. Breaux, known to me to be the person whose name is subscribed to the foregoing document, and being by me first duly sworn, declared that the statements therein contained are true and correct.

Subscribed and sworn to before me on the 1<sup>ST</sup> day of April, 2015, to certify which witness my hand and official seal.



Corey R. Stewart  
NOTARY PUBLIC  
STATE OF NEW YORK

COREY R STEWART  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01ST6263503  
Qualified In Putnam County  
My Commission Expires June 11, 2016